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STATE OF ILLINOIS )  
COUNTY OF COOK )

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

FILED

ALLYSON ALBRECHT, individually )  
and as mother and best friend of )  
RORY-MORRIS MARTIN ALBRECHT, )  
a minor, )

Plaintiff, )

vs. )

KNOWLEDGE LEARNING CORP, )  
KNOWLEDGE LEARNING CENTERS, )  
INC, KC DEVELOPMENT CORP., )  
KINDERCARE REAL ESTATE LLC., )  
KINDERCARE AND MS. KATHERINE )  
DOE )

Defendants. )

No. 08 CV 3922

JUDGE KENDALL  
MAGISTRATRE JUDGE DENLOW  
AEE

AUG 12 2008 TC  
Aug 12, 2008  
MICHAEL W. BOBBINS  
CLERK, U.S. DISTRICT COURT

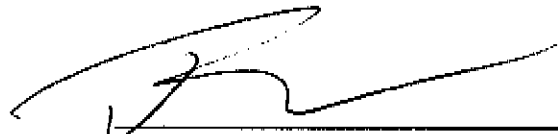
**MOTION TO AMEND COMPLAINT TO IDENTIFY PROPER PARTY and MOTION TO  
COMPEL DEFENDANTS TO DISCLOSE MS. CATHERINE RADER'S ADDRESS**

NOW COMES the Plaintiff, ALLYSON ALBRECHT, individually and as mother and best friend of RORY-MORRIS MARTIN ALBRECHT, and in support of her motion states as follows:

- 1) Plaintiff previously filed this action against the various Knowledge Learning Center Corporate defendants and a Ms. Katherine Doe.
- 2) The case was filed against Ms. Katherine Doe because through investigation the Plaintiff was unable to determine her correct name.
- 3) This case involves a personal injury, wherein Mr. Catherine tripped and fell on a minor causing a head injury which resulted in seizures.
- 4) Since the original filing of this matter the Plaintiff has learned the correct name of Katherine Doe is Ms. Catherine Rader
- 5) Plaintiff seeks to amend the complaint to properly name Ms. Catherine Rader.

In a letter dated July 15, 2008, the Plaintiff requested that the Defense attorneys provide plaintiff with the name and current address of Ms. Katherine. Plaintiff was attempting to determine whether or not there is complete diversity. To date, the Defendants have refused to provide the Plaintiff with Ms. Catherine's current address. On information and belief she is a current employee of the defendants.

Wherefore, the plaintiff requests leave to file an amended complaint to reflect the correct name of Ms. Katherine Doe and ask that this court order the Defendants to disclose Ms. Catherine Rader's current address.

A handwritten signature in black ink, appearing to read 'JOSEPH G. KLEST', written over a horizontal line.

JOSEPH G. KLEST, Attorney for Plaintiff

JOSEPH G. KLEST  
1701 E. Woodfield Road, Ste. 909  
Schaumburg, IL 60173  
(847) 969-9510  
Attorney NO. 50239